

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of: )  
 ) WT Docket No. 13-188  
4RF Ltd. Request for Waiver of Part 90 Emissions )

To: the Commission, through:  
Chief, Wireless Telecommunications Bureau

**COMMENTS**

COMES NOW the undersigned, JAMES EDWIN WHEDBEE, who pursuant to the Commission's invitation and Sections 1.41 and 1.925(c) of the Commission's rules and regulations [*47 C.F.R. §§1.41, 1.925(c)*] respectfully comments on the (inferred) Petition of 4RF Limited (“4RF”) for a waiver of Section 90.207(i) of the Commission's rules and regulations [*47 C.F.R. §90.207(i)*] as follows.

1. That 4RF requests waiver for G1D emissions rather than the F1D emissions §90.207(i) already authorizes may be a bit of an academic point. Whenever the frequency of RF waves change, so does the phase and vice versa, so while there are some minor academic differences in the emissions, they are for all intents and purposes one and the same. Accordingly, inasmuch as G1D emissions are concerned, grant the waiver without hesitation. I would only remark that I appreciate 4RF's honesty in seeking the waiver for this minor a deviation from the rules and would suggest to the Commission that perhaps it include an explanatory note for future equipment makers that using G1D will be treated as if the emissions were F1D, so that further need for waiver requests can be dispensed with immediately.

2. For SCADA transmissions, 4RF also requests waiver for D1D emissions. D1D emissions are

more than a technical deviation from the rules; however, if it will expedite the migration of services to higher frequency bands, I think a grant of the waiver request to authorize D1D emissions shall be in the public interest. Accordingly, I recommend the Commission grant 4RF's waiver request with respect to the D1D emissions.

3. Proof of concept and other matters aren't at issue in this matter; accordingly, I respectfully suggest the Commission grant the waiver petition/request permanently with regard to the types of transmitters in the petition/request of 4RF.

WHEREFORE, the undersigned respectfully requests the Commission permanently grant 4RF's waiver petition/request for the emission designators shown therein.

Respectfully submitted,

July 29, 2013

A handwritten signature in black ink, appearing to read 'J. Whedbee', with a stylized flourish at the end.

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